

EXHIBIT A

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DILLON C. BIERING,

Plaintiff(s)

vs.

SCHURMAN FINE PAPERS D/B/A
SCHURMAN RETAIL GROUP,

Defendant(s)

) IN THE MAGISTRATE'S COURT

) NINTH JUDICIAL CIRCUIT

) C/A NO.: 2019-CV-10-11501152

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FILED IN
CHARLESTON COUNTY

JUN 3 2019

NORTH ANNEA
SMALL CLAIMS COURT

SUMMONS

(JURY TRIAL DEMANDED)

TO THE DEFENDANT, ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to Answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint upon the undersigned attorney, at 103 Broughton Road, Moncks Corner, South Carolina, 29461, within thirty (30) days after service hereof, exclusive of the day of such service. If you fail to Answer the Complaint within thirty (30) days, judgment by default will be rendered against you for the relief demanded in the Complaint.

BIERING LAW FIRM, P.C.



Christopher P. Biering, Esquire
103 Broughton Road
Moncks Corner, South Carolina 29461
(843) 761-4888 Fax: (843) 899-9015
ATTORNEY FOR THE PLAINTIFF
chris@bieringlawfirm.com

Moncks Corner, South Carolina
May 29, 2019

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DILLON C. BIERING,

Plaintiff(s)

vs.

SCHURMAN FINE PAPERS D/B/A
SCHURMAN RETAIL GROUP,

Defendant(s)

) IN THE MAGISTRATE'S COURT
) NINTH JUDICIAL CIRCUIT
) C/A NO.: 2019-CV-10-11501152

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NOV 13 AREA
SMALL CLAIMS COURT

COMPLAINT
(JURY TRIAL DEMANDED)

TO THE DEFENDANT, ABOVE-NAMED:

Plaintiff, by and through his attorney, complaining of the Defendant, would respectfully show to this Court and allege on information and belief as follows:

1. Upon information and belief, Defendant, Shurman Fine Papers is corporation, organized pursuant to the laws of California, registered to do business in the State of South Carolina, primarily conducting business at 193 Meeting Street, Charleston, South Carolina, in the County of Charleston.

2. The Plaintiff is a resident and citizen of the County of Berkeley, State of South Carolina.

3. The Plaintiff was employed by the Defendant. During the time of his employment, the Defendant emailed copies of all 2016 employee W-2 forms to an external email account that turned out to be a fraudulent account. The information sent contained the Plaintiff's name, address, Social Security number and wage information.

4. That the Plaintiff is informed and believes that the acts of the Defendants

are a breach of confidentiality, privacy and security of Plaintiff's personal information.

5. By reason of the acts and omissions of the Defendant as set forth above, the Plaintiff is informed and believes that the Plaintiff is entitled to an award of actual damages, together with punitive damages in an appropriate amount to be determined by the jury, and for the cost of this action.

All to Plaintiff's damage, both actual and punitive, in an amount to be determined by the finder of fact.

WHEREFORE, the Plaintiff prays for judgment against the Defendants in an amount of statutory damages of \$7,500.00, and reasonable attorney fees and costs as provided for by statute, including any costs resulting in this action, and for such other and further relief as this Honorable Court might deem just and proper.

BIERING LAW FIRM, P.C.



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